



Direct Certification and Verification

October 3, 2023

3100 – Free and Reduced Price Meal
Benefits

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What is Direct Certification?

Direct certification allows School Food Authorities (SFAs) to certify children as eligible for free meal benefits using participant data from other means-tested programs, eliminating the need for a household applications.

- Supplemental Nutrition Assistance Program (SNAP)
 - Temporary Assistance for Needy Families (TANF)
 - Homeless
 - Foster
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Direct Certification Benefits

- Families do not need to complete a paper household application
 - Decreases the number of applications schools need to process and verify
 - Decreases the likelihood of errors when processing applications
 - Eligible students can be added throughout the school year through data matches
 - A student who is directly certified is free for the entire school year AND for up to 30 operating days into the new school year, or until a new eligibility determination is made, whichever comes first
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Direct Certification – How does it work?

SFA enrollment is imported into the QLIK system through various Student Information Systems (SIS):

- District of Columbia Public Schools (DCPS) - ASPEN
- Public charter schools - Student Information System (SIS)
- Private schools – **NEW:** QuickBase

*It is important to work with your enrollment team/registrars to ensure QLIK/QuickBase enrollment is up to date



Direct Certification – How does it work?

Data from other programs is imported into QLIK:

- DC Department of Human Services (DHS) Income Maintenance Administration (IMA) identifies individuals between (and including) ages three and 21 that are participating in **TANF or SNAP**.
- **QLIK**
 - DCPS
 - PCS
 - DHS
- **QuickBase**
 - Private Schools



Direct Certification – How does it work?

Direct certification data is then pulled by the SFA by running a report in the following systems:

- **Qlik**
 - DCPS
 - PCS
- **QuickBase**
 - Private Schools



The screenshot shows a Qlik dashboard titled "Direct Certification". It includes a header with a network diagram, a "Data last loaded" timestamp of Jun 14, 2023, 9:00 AM, and a "Published to: Health and Wellness" note. Below the header are navigation options for Sheets, Bookmarks, and Stories. A section for "Public sheets (1)" features a bar chart and a highlighted report titled "SY22-23 Direct Certification".

SY 2022-23 Enrollment Status Report

Enrollment Status		Enrolled	Exited	Incomplete	Totals
School Name	Related Site (ref) - School Code2	Number of Students	Number of Students	Number of Students	Number of Students
Academia De La Recta Porta Iclds Intl. Christian Day School	[REDACTED]	6	-	-	6
Acton Academy	[REDACTED]	25	6	-	31
Aidan Montessori School	[REDACTED]	82	-	-	82
Annunciation Catholic School	[REDACTED]	100	-	-	100
Archbishop Carroll High School	[REDACTED]	290	-	1	291
Beauvoir, The National Cathedral Elementary School	[REDACTED]	281	-	-	281
Bishop John T. Walker School For	[REDACTED]	82	-	-	82



Direct Certification Requirements

- Direct certification data is available daily through QLIK
- The direct certification process **must** be conducted three times per school year
- Best Practices:
 - On Oct. 1 (or first operating day of Oct.) capture students whose prior year eligibility has expired.
 - Run reports monthly or as often as possible to reach students who become eligible during the school year.
 - Inform families of any change in their student's eligibility status immediately.
 - Be sure to save each report as they are run.



Verification



What is Verification?

Annually, SFAs must verify eligibility of students from a sample of household applications approved for free and reduced-price benefits for the current school year.

- Verification is only required when eligibility is determined through the application process
- Verification is not required for eligibility determinations made through the direct certification process
- Verification must include confirmation of either:
 - Income Eligibility
 - Receipt of assistance under SNAP or TANF, by the child or any member of the household; or
 - Other Source Categorical Eligibility



Students Exempt from Verification

The following student categories are exempt from the verification process:

- Students certified as migrant, homeless, runaway and/or foster child
- Students on the direct certification list and siblings or household members of students on the direct certification list
- Head Start students certified by a Program Coordinator as eligible and in a federally funded slot



Verification Timeline

Date	Description
October 1*	Determine the final sample pool size: the total number of applications approved as of October 1.
	Establish the sample size: the number of applications subject to verification. 3% of the total or 3,000 applications (whichever is less). All fractions or decimals must be rounded up to the nearest whole number
	Determine sample size method. The standard sample size must be used unless the SFA qualifies to use an alternate sample size AND notifies OSSE of their intent to use an alternate verification sample size prior to October 1 st .
	Select applications for verification based on sample size method.

* Verification may be started prior to October 1st.



Sample Sizes

AVAILABLE SAMPLE SIZES

Standard Sample Size

Standard	Sample size is the lesser of: <ul style="list-style-type: none">• Three percent of all applications approved by the LEA for the school year, as of October 1 of the school year, selected from error prone applications; or• 3,000 error prone applications approved by the LEA for the school year, as of October 1 of the school year.
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Alternate Sample Sizes Available to Qualified LEAs

Alternate One	Sample size equals the lesser of: <ul style="list-style-type: none">• Three percent of all applications approved by the LEA for the school year, as of October 1 of the school year, selected at random; or• 3,000 applications approved by the LEA for the school year, as of October 1 of the school year, selected at random.
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Alternate Two	Sample size equals the lesser of the sum of either: <ul style="list-style-type: none">• 1,000 of all applications approved by the LEA, as of October 1 of the school year, selected from error prone applications; or• One percent (1%) of all applications approved by the LEA, as of October 1 of the school year, selected from error prone applications. PLUS the lesser of: <ul style="list-style-type: none">• 500 applications approved by the LEA, as of October 1 of the school year, which provide case numbers in lieu of income information; or• One-half of one percent (.05%) of applications approved by the LEA, as of October 1, of the school year that provide case numbers in lieu of income information.
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Choosing the Sample

The standard sample size must be used unless the SFA qualifies to use an alternate sample size AND notifies OSSE of their intent to use an alternate verification sample size prior to October 1st.

There are two ways an LEA may annually qualify to use an alternate sample size based on lowered non-response rates:

1. **Lowered Non-Response Rate:** An LEA may use an alternate sample size when its non-response rate for the preceding school year was less than 20 percent.
2. **Improved Non-Response Rate:** An LEA with more than 20,000 children approved by application as eligible, as of October 1 of the school year, may use an alternate sample size for any school year when its non-response rate for the preceding school year was at least 10 percent below the non-response rate for the second preceding school year.



Choosing the Sample

of approved applications by October 1:

137

Sample Size:

5 ($137 \times 3\% = 4.11$ rounded up to 5)

Prior year's non-response rate:

17% (per FNS-742 report)

Eligible to use alternate sample size:

Yes

Notified OSSE of intent to use alternate sample size by October 1:

Yes

Sample Size:

Alternate One, 5 applications selected at random



Choosing the Sample

of approved applications by October 1:

452

Sample Size:

14 ($452 \times 3\% = 13.56$ rounded up to 14)

Prior year's non-response rate:

23% (per FNS-742 report)

Eligible to use alternate sample size:

No

Notified OSSE of intent to use alternate sample size by October 1:

Yes

Sample Size:

Standard, 14 applications selected from error prone applications



Error Prone

Yearly	Error prone applications are those applications where income falls between the income eligibility limits and \$1200 of the income eligibility limits for Yearly.
Monthly	Error prone applications are those applications where income falls between the income eligibility limits and \$100 of the income eligibility limits for Monthly.
Twice Per Month	Error prone applications are those applications where income falls between the income eligibility limits and \$50 of the income eligibility limits for Twice per Month.
Every 2 Weeks	Error prone applications are those applications where income falls between the income eligibility limits and \$46.15 of the income eligibility limits for Every 2 weeks.
Weekly	Error prone applications are those applications where income falls between the income eligibility limits and \$23.07 of the income eligibility limits for Weekly.



Error Prone

Error Prone Chart for FREE Eligibility Applications July 1, 2023 - June 30, 2024

How Often Income Was Received

Family Size	Yearly Error Prone			Monthly Error Prone			Twice Per Month Error Prone			Every Two Weeks Error Prone			Weekly Error Prone		
1	17,754	to	18,954	1,480	to	1,580	740	to	790	682.85	to	729	341.93	to	365
2	24,436	to	25,636	2,037	to	2,137	1,019	to	1,069	939.85	to	986	469.93	to	493
3	31,118	to	32,318	2,594	to	2,694	1,297	to	1,347	1,196.85	to	1,243	598.93	to	622
4	37,800	to	39,000	3,150	to	3,250	1,575	to	1,625	1,453.85	to	1,500	726.93	to	750
5	44,482	to	45,682	3,707	to	3,807	1,854	to	1,904	1,710.85	to	1,757	855.93	to	879
6	51,164	to	52,364	4,264	to	4,364	2,132	to	2,182	1,967.85	to	2,014	983.93	to	1,007
7	57,846	to	59,046	4,821	to	4,921	2,411	to	2,461	2,224.85	to	2,271	1,112.93	to	1,136
8	64,528	to	65,728	5,378	to	5,478	2,689	to	2,739	2,481.85	to	2,528	1,240.93	to	1,264

Error prone Chart for REDUCED Eligibility Applications July 1, 2023 - June 30, 2024

How Often Income Was Received

Family Size	Yearly Error Prone			Monthly Error Prone			Twice Per Month Error Prone			Every Two Weeks Error Prone			Weekly Error Prone		
1	25,773	to	26,973	2,148	to	2,248	1,074	to	1,124	991.85	to	1,038	495.93	to	519
2	35,282	to	36,482	2,941	to	3,041	1,471	to	1,521	1,357.85	to	1,404	678.93	to	702
3	44,791	to	45,991	3,733	to	3,833	1,867	to	1,917	1,722.85	to	1,769	861.93	to	885
4	54,300	to	55,500	4,525	to	4,625	2,263	to	2,313	2,088.85	to	2,135	1,044.93	to	1,068
5	63,809	to	65,009	5,318	to	5,418	2,659	to	2,709	2,454.85	to	2,501	1,227.93	to	1,251
6	73,318	to	74,518	6,110	to	6,210	3,055	to	3,105	2,820.85	to	2,867	1,410.93	to	1,434
7	82,827	to	84,027	6,903	to	7,003	3,452	to	3,502	3,185.85	to	3,232	1,592.93	to	1,616
8	92,336	to	93,536	7,695	to	7,795	3,848	to	3,898	3,551.85	to	3,598	1,775.93	to	1,799



Choosing the Sample – Planning

of approved applications by October 1:

Sample Size:

Prior year's non-response rate:

Eligible to use alternate sample size:

Notified OSSE of intent to use alternate sample size by October 1:

Sample Size:



Verification Timeline

Process	Description
Prior to contacting households	A determining official must review each approved application selected for verification to ensure the initial determination was accurate.
	If applicable, replace applications in sample up to 5% (for example if review moved any applications to a paid status)
Household Notification of Selection	<p>Inform the household, in writing, of its selection and provide a list of the documents or other forms of evidence the household must submit.</p> <p><u>Template Letters</u></p> <p>LEAs are expected to have a system in place to provide written verification notices in the parent or guardian's primary language, and to provide oral assistance if the parent or guardian has difficulty understanding the written request.</p>



Verification

Process	Description
Upon receipt of documentation	Process documentation immediately.
Follow-Up for Non-Response	The LEA must make at least one attempt to contact the household when the household does not adequately respond to the request for verification. "Non-response" includes no response and incomplete or ambiguous responses that do not permit the LEA to resolve children's eligibility for free and reduced-price meals.
Follow-Up	Inform household of: <ul style="list-style-type: none">• No change in benefits• Increase in benefits• Notice of adverse action
November 15 th – Verification Complete	All applications selected have been either verified or followed up with, sent notices of change in benefits including adverse action, and benefits have been updated accordingly.



Acceptable Written Documentation

Income Eligible	<p>Must contain:</p> <ul style="list-style-type: none">• The name of the household member• Amount of income received• Frequency received• Date income was received
Categorically Eligible (SNAP, TANF)	<p>An official letter or notice indicating children who are members of household that are receiving benefits from that program, such as a notice of eligibility.</p> <p>A document from an Assistance Program must specify the certification time period (for example include an expiration date.)</p>
Other Source Categorically Eligible	<p>An official letter, notice, or list from appropriate social service agency, program office or coordinator, or court would be acceptable.</p>



Non-Response Follow-Up

The required follow-up attempt may be in writing (mail or e-mail) or by telephone or text message.

The SFA must make a follow-up attempt when:

- The household does not respond to the initial request for verification
- The household submits insufficient or obsolete written evidence
- The household does not designate collateral contacts
- The collateral contacts are unable or unwilling to provide the requested evidence

When following up with household, the SFA:

- Must inform the household that failure to provide adequate written evidence will result in termination of benefits
- Must attempt to obtain the missing written evidence
- Must contact the household to complete the verification process



Follow-Up

No Change in Status	Verify the application.
Increase in Benefits	Notify household benefits will be increased and increase student benefits. The change is effective immediately and must be implemented no later than three operating days from the date verification was completed.
Decrease in Benefits (including non-response)	Notify households of reduction in benefits (adverse action) and their right to reapply for benefits at any time. SFAs must provide 10 calendar days advanced written notification to households receiving a reduction or termination of benefits, prior to the actual reduction or termination. 10 days after notification, reduce student benefits.



Adverse Action

A notice of adverse action must advise the household of:

- Change in benefits;
- Reasons for the change;
- The household may reapply for benefits at any time during the school year
- Household's right to appeal an adverse action including:
 - An appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision
 - Instructions on how to appeal

When a household appeals an adverse action within the 10-calendar day advanced notice period, the SFA must continue to provide the benefits for which the child was originally approved, until a final determination is made.



Record Retention

Must keep the following records for three years plus the current year:

- Original applications and # of applications on file as of October 1st
- Summary of verification efforts including selection process
- Notification letters sent to households
- Documents submitted by households including date of submission
 - Documents used to verify eligibility or determine a change in benefits
 - Relevant correspondence between SFA and households (including follow-up)
- Documentation of changes in benefits:
 - Reason for the change
 - Household notification and date it became effective
 - Title and signature of verifying official
- All documentation concerning appeals



Households that Reapply for Benefits

- Households affected by a reduction in benefits may reapply for benefits at any time during the school year
- The household should be required to submit income documentation or proof of participation in SNAP or TANF before approval of a new application



Verification

Process	Description
November 15 th – Verification Complete	All applications selected have been either verified or followed up with, sent notices of change in benefits including adverse action, and benefits have been updated accordingly.
December 15 th – FNS 742 Due	Complete FNS 742 report and upload via Orchard in Documents section of NSLP application.



Verification Collection Report FNS-742

Print

OMB APPROVED NO. 0584-0594

Expiration Date: 06/30/2019

Department of Agriculture, Food and Nutrition Service
School Food Authority (SFA) Verification Collection Report

State agencies must report the information on this form ANNUALLY for each SFA with schools operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP).

All SFAs, including SFAs with all schools exempt from verification requirements, must complete applicable sections.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB number for this collection is 0584-0026. The time required to complete this information collection is 45 minutes per response, including the time to review instructions, search existing data resources, gather the data needed and complete and review the information collection.

State Agency Name:	SFA ID#:	Type of SFA: <input type="checkbox"/> Public <input type="checkbox"/> Nonprofit/Private	School Year: From: 20 To: 20
SFA Name:	SFA City:	SFA Zip code:	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>

Section 1	Total Schools, Residential Child Care Institutions (RCCIs) and Enrolled Students	**All SFAs must report Section 1**		A. Number of Schools OR Institutions	B. Number of Students
		1-1: Total schools (Do not include RCCIs):			
		1-2: Total RCCIs (Do not include schools counted in 1-1):			
		1-2a: RCCIs with day students (Report ONLY day students in 1-2aB):			
		1-2b: RCCIs with NO day students:			

Section 2	SFAs with schools operating alternate provisions	**ONLY SFAs with alternate provisions must report Section 2**		A. Number of Schools AND Institutions	B. Number of Students
		2-1: Operating Provision 2/3 in a BASE year for NSLP and SBP:			
		2-2: Operating Provision 2/3 in a NON BASE year for NSLP and SBP:			
		2-2a: Provision 2/3 students reported as FREE in a NON BASE year:			
		2-2b: Provision 2/3 students reported as REDUCED PRICE in a NON BASE year:			
		2-3: Operating the Community Eligibility Option:			



Resources

[Eligibility Manual for School Meals Determining and Verifying Eligibility](#)

[Verification Template Letters](#)

[OSSE Standard Operating Procedure: Use of an Alternate Verification Sample Size](#)

[Error Prone Chart](#)

[Income Eligibility Guidelines](#)

[School Food Authority Verification Collection Report \(FNS 742\)](#)

[USDA Verification Toolkit](#)



Q&A